Eileen,

MIEMSS has the following comments to the draft cardiac/PCI regulation posted for informal comment contained in the link below:

http://mhcc.dhmh.maryland.gov/shp/Documents/statehealthplan/comar102417/10_24_17_FOR_INFORMAL_COMMENT_POSTED_093013.pdf

At the top of page 10, the first sentence should be re-written to read, "Cardiac Interventional Centers are hospitals that have authorization from MHCC to provide primary PCI and are designated by MIEMSS and approved by the EMS Board to receive STEMI patients being transported by ambulancewho meet specific criteria determined by the *Maryland Medical Protocols for EMS Providers*."

On the middle of page 10, line 10 in the first paragraph under *Policy Guidance*, it should read "Maryland Institute for Emergency Medical Services Systems" (currently, the "s" is missing from the end of our name). The same also needs to be corrected in the references to MIEMSS in the footnotes at the bottom of page 10.

In the Institutional Resources Sections on both pages 19, 4(j) and 31, 4(i) regarding the agreement hospitals without cardiac surgery on-site must have with an ambulance service, the language in the draft is incorrect as currently written. There is in fact no such entity as "an advanced cardiac life support emergency services provider" in Maryland. MIEMSS had previously submitted the following language that was included in the final report of the CAG posted on MHCC webpage-

Maintain a formal written agreement with a licensed specialty care ambulance service that, when clinically necessary, guarantees arrival of the air or ground ambulance within 30 minutes of a request for patient transport by hospitals performing primary PCI without on-site cardiac surgery.

In order to be correct and consistent with the appropriate level of care required for this type of patient transport, MIEMSS requests the language be changed as written in italics above.

Thank you for the opportunity to participate and comment.

Lisa

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